

REMARKS

Claims 20-41 are pending in the above-identified patent application. Claims 20-25, 28, 33, 34, 37 and 41 have been amended. Applicants respectfully request entry of this Amendment, and reconsideration and allowance of this application.

Applicants believe that the Amendment overcomes the rejections under 35 U.S.C. 112, second paragraph. Applicants request withdrawal of this rejection.

The rejection of Claims 20-27, 29, 31-33, 35, 37-38 and 40 under 35 U.S.C. 103(a) as being unpatentable over Fahy (U.S.P.N. 5,488,984) in view of Heimann (U.S.P.N. 5,714,093), is respectfully traversed.

Fahy discloses a process for treating metal components, which are die punched from a sheet, that are used in manufacturing an electric motor. The process of Fahy employs a coating composition comprising sodium nitrate, sodium tetraborate and a wetting agent. Heimann relates to gels, greases and coating for improving the corrosion resistance of metals such as wires, nuts, bolts, and concrete rebar. Unlike Fahy, the disclosure of Heimann does not indicate that any fabrication such as encapsulation in molten metal occurs subsequent to applying the corrosion resistant compositions. In particular, Heimann does not disclose contacting coated components with molten metal, or that his composition is effective in retarding corrosion of electric motor laminations, or that his composition has any effectiveness in an environment involving molten metal.

It is important to note that Fahy and Heimann are not in the same field of endeavor. That is, Fahy does not disclose, teach or suggest that gels, lubricants or greases are useful for treating electric motor laminates, and Heimann does not suggest that his gels, lubricants and greases are useful in withstanding the molten metal encapsulation employed by Fahy. Further, Fahy lacks any disclosure indicating that corrosion is a problem. Further still, neither Fahy or Heimann provide any basis for equating or substituting corrosion resistance for resistance to molten metal or preventing adhesion/solder between steel and aluminum.

Moreover, even though Heimann discloses sodium silicate on Col. 13, Line 10 and Col. 14, Lines 10-11, such disclosure is unrelated to reducing corrosion caused by molten metal contact. Applicants, therefore, respectfully submit the requisite motivation to combine these references (which is not based upon Applicants' disclosure), has not been established. Improperly combined references cannot be employed to establish a prima facie case of obviousness and, accordingly, Applicants respectfully request withdrawal of this rejection.

The rejection of Claims 30, 36 and 39 under 35 U.S.C. 103(a) as being unpatentable over Fahy and Parkinson or Heimann and further in view of Takimoto et al. (U.S.P.N. 5,298,059), is respectfully traversed.

Fahy, Parkinson and Heimann each contain the aforementioned deficiencies. Takimoto clearly teaches away from silica or a silica containing composition. The Abstract Takimoto states that Takimoto's composition obviates the necessity for incorporating silica (see also Col. 2, Lines 25-45 of Takimoto). Further, Takimoto is limited to anticorrosive coatings and lacks any disclosure relating to protecting surfaces from molten metal or electric motors (e.g., rust-proofed steel for use in electrical appliances is not equivalent to usage in an electrical motor.). Takimoto, therefore, fails to remedy the deficiencies of the primary references and, accordingly, Applicants respectfully request withdrawal of this rejection.

In instant application claims benefit of U.S. Patent Application Serial No. 09/549,119 (now U.S. Patent No. 6,455,100). Applicants respectfully request consideration of this patent as well as the references cited therein on the previously submitted Supplemental Information Disclosure Statement.

Applicants believe that the pending claims define patentable subject matter and respectfully request issuance of a Notice of Allowability for the instant application. Should there any other fee due in connection with the instant application, please charge

the same to Deposit Account No. 15-0680 (Orscheln Management Co.). Should the Examiner deem that any further action on the part of Applicants would advance prosecution of this application, the Examiner is invited to telephone Applicants' attorney.

Respectfully Submitted,



Michael K. Boyer
Attorney for Applicants
U.S.P.T.O. Reg No 33085
Tel: 660 269-4536
Fax: 660 269-4530
Email: mboyer@orscheln.com